

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JOEL BUSEL REVOCABLE TRUST,

SANDRA BUSEL REVOCABLE TRUST,

JOEL BUSEL, in his capacity as Trustee of the Joel  
Busel Revocable Trust and the Sandra Busel  
Revocable Trust, and in his capacity as grantor of  
the Sandra Busel Revocable Trust, and

SANDRA BUSEL, in her capacity as Trustee of the  
Sandra Busel Revocable Trust and the Joel Busel  
Revocable Trust, and in her capacity as grantor of  
the Sandra Busel Revocable Trust,

Defendants.

Adv. Pro. No. 10-04423 (SMB)

**STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION**

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted  
pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation

Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including October 24, 2014.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

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Dated: July 28, 2014  
New York, New York

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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff*

Dated: July 28, 2014  
Fort Lauderdale, Florida

By: /s/ Michael I. Goldberg  
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Trust, Sandra Busel Revocable Trust, Joel Busel  
and Sandra Busel*

/s/ Melanie L. Cyganowski  
Melanie L. Cyganowski, Mediator